

October 29, 2007

Ms. Desiree Desselle  
Senior Field Representative  
Washington Federation of State Employees  
316 West Boone, Suite 353  
Spokane, WA 99201

RE: Jane McLean v. Community Colleges of Spokane  
Allocation Review Request ALLO-06-004

Dear Ms. Desselle:

On June 20, 2007, I conducted a Director's review meeting by telephone conference call concerning the allocation of Ms. McLean's position. Present at the Director's review meeting were you and Ms. McLean ; Michael Lenker, Human Resources Representative from Community Colleges of Spokane; and Ms. McLean's supervisor, Jille Shankar, Associate Director of Financial Aid.

### **Background**

On May 22, 2006, Ms. McLean submitted a Position Review Request (PRR) to Spokane Falls Community College's (SFCC's) Financial Aid Department, requesting that her Program Coordinator position be reallocated to a Program Manager A. Ms. McLean had requested a similar review of her position in 2001. At that time, both SFCC and the Department of Personnel (DOP) acknowledged Ms. McLean had extensive responsibility for the student loan portion of the financial aid program but concluded the Program Coordinator classification was the best fit for her position. On June 9, 2006, Human Resources Representative Michael Lenker performed an audit of Ms. McLean's position. Mr. Lenker determined there were some changes to Ms. McLean's assignment of work, such as a process change from paper applications to web based, but concluded the underlying duties were the same as they had been in 2001. Again, SFCC concluded Ms. McLean performed her duties with a high level of independence but asserted the Program Coordinator classification was the best fit.

On July 24, 2006, the Department of Personnel received your request for a Director's review of SFCC's determination, on behalf of Ms. McLean.

### **Summary of Ms. McLean's Perspective**

Ms. McLean asserts that multiple classes could apply to the work she performs and contends the level and scope of her responsibility far exceeds that of a Program Coordinator. Ms. McLean describes the loan programs as complex and requiring a minimum of five years experience to process the federal loans. Ms. McLean asserts new regulations have gone into effect and states she works with other Program Coordinators and staff almost daily to resolve problems. Ms. McLean also asserts she has trained her supervisor and the Assistant Dean for Financial Aid on how to process and certify student loans. Ms. McLean states she writes and revises policies and procedures, manages software programs and the website, trains all staff on loan certifications, monitors and audits loans, and serves as the liaison for student loans. As such, Ms. McLean contends she is the individual who manages the loan program and asserts her position should be reallocated to a higher-level classification.

### **Summary of SFCC's Reasoning**

SFCC acknowledges Ms. McLean is very knowledgeable about financial aid rules and regulations and has been regarded as the content expert concerning the loan programs. SFCC further acknowledges Ms. McLean's position works independently and has lead responsibilities for SFCC's student loan programs. However, SFCC asserts the section dealing with loans is a subset of the overall financial aid program and asserts the delegated authority and responsibility for the financial aid program resides with the Associate Director and Assistant Dean of Financial Aid. Further, SFCC asserts Ms. McLean coordinates rather than manages the loan programs. While SFCC agrees the process for applying for student loans has changed from a paper to web based process with complex technical issues and that loan dollar amounts have increased, the college asserts the underlying process is the same. As a result, SFCC contends the duties and responsibilities assigned to Ms. McLean's position are relatively the same as they were in 2001 when DOP determined her position was properly allocated to the Program Coordinator class on a best fit basis. SFCC agrees the scope of responsibility assigned to Ms. McLean's position goes beyond the level envisioned in the Program Coordinator class but maintains the allocation is the most appropriate fit with the classifications available.

### **Director's Determination**

This position review was based on the work performed for at least the six-month period prior to May 22, 2006.

As the Director's designee, I carefully considered all of the documentation in the file, the exhibits presented during the Director's review meeting, and the verbal comments provided by both parties. Based on my review and analysis of Ms. McLean's assigned duties and responsibilities, I conclude her position is properly allocated to the Program Coordinator classification.

### **Rationale for Determination**

On the PRR (Exhibit P-2), the purpose of Ms. McLean's position indicates she manages approximately 7 million in loan programs. It also notes that she reads and interprets federal regulations; writes, analyzes, and revises procedures; assigns loan workload and monitors staff; and reconciles and resolves all loan issues.

The main job duties described on the PRR include the following and are identified as 55% of her overall work:

- Manage all aspects of the 7 million dollar Federal Direct Loan programs, including Subsidized, Unsubsidized, and Parent (PLUS) Loans.
- Manage all aspects of the Alaska Loan programs, including the Family Education, Winn Brindle, and Alaska Scholarship Education Loan programs.
- Manage all aspects of the many Alternative Loan programs through outside lenders.
- Read and interpret federal and private loan regulations and write and update office procedures as needed. Organize loan information and paperwork flow through financial aid department. Organize policies and procedures and train staff on procedures. Update loan forms and websites. Resolve loan problems. Keep supervisor abreast of changes in programs.
- Represent the financial aid department and the college at conferences and focus groups and through testing. Act as a liaison with the Department of Education and its contractors, SFCC business office, and various lenders.

In an attachment to the PRR, Ms. McLean's supervisor, Ms. Shankar, wrote the following: "Jane has the authority to review, approve or deny satisfactory progress petitions." Ms. McLean also leads other positions, trains, and manages the workload by assigning or reassigning loans to staff and checking work. Ms. Shankar noted Ms. McLean advises her if retraining an employee does not result in a reduction in errors. During the Director's review meeting, Ms. Shankar clarified that Ms. McLean did not review every loan processed and stated that other Program Coordinators independently processed loans as well but that Ms. McLean reviewed the loans when problems occurred or the loans were rejected by the import/export system.

Ms. Shankar also provided a list of examples detailing Ms. McLean's decision making authority, including the following:

- Exercise professional judgment when evaluation student financial aid applications, data discrepancies, and changes in a student's financial circumstances;
- Independently award and adjust, if necessary, federal, state and institutional financial aid grants;
- Review and approve academic progress petitions;
- Troubleshoot and resolve federal financial aid software problems;
- Counsel students on all aspects of the alternative loan program such as interest rates, repayment options, disbursement options, and dealing with banks.
- Attend the Department of Education Electronic Access Conference and make a determination about sessions impacting SFCC.
- Review Department of Education loan processing errors and determine if resolution is necessary;
- Handle all of the loans for students who previously had discharged loans due to disability;
- Complete Beta testing on Department of Education software and update loan processes and federal financial aid software.

The Program Manager A and B classifications share a common definition. The definition notes that incumbents supervise "a division of a major administrative department, operating unit or program" and relieve "the senior official of operating and administrative detail." In addition, incumbents plan, coordinate, and implement "all functions required by the activity."

Ms. McLean's position does not fit within this definition because she does not supervise the financial aid program. Rather, she has extensive responsibility for the student loan portion of the financial aid program. In that capacity, Ms. McLean leads and directs the work of others, but supervisory responsibility resides with Ms. Shankar as Associate Director of Financial Aid and ultimately the Assistant Dean for Student Services. Additionally, positions allocated to the Program Manager A level are typically first-level

supervisors and those allocated to the Program Manager B, second-level supervisors. Ms. McLean's position has not been assigned that level of supervision. Although the term "manage" has been used to describe Ms. McLean's duties and responsibilities, it does not reflect the full scope of duties of a Program Manager, as identified by the Department of Personnel Classification and Pay Administrative Guide, which indicates that duties involve exercising authority over the following:

- Development of program goals and objectives
- Development of timetables and work plans to achieve program goals and objectives
- Development of program policies and procedures
- Preparation of program budgets, adjustments of allotments and authorizing expenditures
- Controlling allocation of program resources
- Setting and adjusting program priorities
- Evaluating program effectiveness

Similarly, the Assistant Financial Aid Director classification does not appropriately fit her position because the Associate Director of Financial Aid (Ms. McLean's supervisor) has the responsibility of assisting the Assistant Dean for Student Services (including Financial Aid) and assuming full responsibility and authority in her absence. In order for a position to fit the basic function of the Assistant Financial Aid Director class, the incumbent must "[a]ssist the director and assume full responsibility and authority in the absence of the director for all federal, state, and local student aid programs." While Ms. McLean has responsibility in student loans, she does not assist the director in all aspects of the financial aid program.

When considering the Administrative Assistant classifications, I considered the class series concept and basis function of the Administrative Assistant A and B classes, since the Administrative Assistant 4 class did not apply to positions in higher education at the time of this request. The class series concept states, in part, that positions provide support to a head of a major organizational unit, including a "major academic or administrative department" in functional areas such as budget development and/or management, grant contract proposal preparation, space planning and analysis, expenditure control, student services, executive secretarial support, and curriculum planning. While Ms. McLean does provide support in student services, she reports to Ms. Shankar, not the Assistant Dean of Student Services. Additionally, the focus of her duties specifically relates to the loan programs within the financial aid program, making the Program Coordinator classification a better fit than the Administrative Assistant classes.

The definition for the Program Coordinator classification reads, "[c]oordinate the operation of a specialized or technical program." The student loan program is a

specialized program within financial aid, and Ms. McLean's position is responsible for coordinating the day-to-day operations of the program.

The distinguishing characteristics for the Program Coordinator state:

Under general direction, perform work using knowledge and experience specific to the program. Exercise independent judgment in interpreting and applying rules and regulations. Independently advise students, staff, program participants and/or the public regarding program content, policies, procedures and activities; select/ recommend alternative courses of action and either:

- Project, monitor, maintain, initiate and/or approve expenditures on program budgets

OR

- Have extensive involvement with students, staff, the public and/or agencies in carrying out program activities, and coordinate, schedule and monitor program activities to determine consistency with program goals.

Ms. McLean works under general direction, exercises independent judgment, interprets and applies rules and regulations, and uses her expertise and knowledge regarding financial aid to assist and advise students and staff about all aspects of student loan processes. While I agree with earlier determinations that Ms. McLean's duties and responsibilities extend beyond the Program Coordinator class, it is the classification that best describes her position, based on the classifications available during the timeframe relevant to this request.

As the parties previously indicated, a review of the current duties and responsibilities of Ms. McLean's position might be appropriate since the final stage of class consolidations occurred on July 1, 2007. The job classes under the classification plan now apply to both general government and higher education. As an example, the Program Specialist classes are now available to positions in higher education. Ms. McLean may request a review of her current duties and responsibilities in accordance with college procedures and the provisions of the collective bargaining agreement.

However, based on the assigned duties and responsibilities for the period of time relevant to this review, the Program Coordinator classification best describes Ms. McLean's position.

**Appeal Rights**

WAC 357-49-018 provides that either party may appeal the results of the Director's review to the Personnel Resources Board (board) by filing written exceptions to the Director's determination in accordance with Chapter 357-52 WAC.

WAC 357-52-015 states that an appeal must be received in writing at the office of the board within thirty (30) calendar days after service of the Director's determination. The address for the Personnel Resources Board is 2828 Capitol Blvd., P.O. Box 40911, Olympia, Washington, 98504-0911.

If no further action is taken, the Director's determination becomes final.

Sincerely,

Teresa Parsons  
Director's Review Supervisor  
Legal Affairs Division

c: Jane McLean  
Michael Lenker, SFCC  
Lisa Skriletz, DOP

Enclosure: List of Exhibits